

## UNITED STATES DISTRICT COURT

for the

District of \_\_\_\_\_

Division \_\_\_\_\_

DARYL SINGLETERRY

Case No.

24-CV-190

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SHAHEEN &amp; GORDON LAW FIRM

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DARYL SINGLETERRY
Street Address	N/A
City and County	PORTSMOUTH ---ROCKINGHAM COUNTY
State and Zip Code	NEW HAMPSHIRE, 03801
Telephone Number	6039887796
E-mail Address	3iiiamb2gmail.com

## B. The Defendant(s)

c/o Amber Findley  
30 Gosling Road, Gosling Meadows

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	AMY DRISCOLL/DRISCOLL LAW OFFICE
Job or Title (if known)	DRISCOLL LAW OFFICE
Street Address	155 FLEET ST.
City and County	PORTSMOUTH ---ROCKINGHAM COUNTY
State and Zip Code	N.H. 03801
Telephone Number	603766-0466
E-mail Address (if known)	drisscollseacoastlaw.com

## Defendant No. 2

Name	WILLIAM SHAHEEN/SHAHEEN & GORDONLAW OFFICES
Job or Title (if known)	SHAHEEN & GORDON
Street Address	353 CENTRAL AVE SUITE 200
City and County	DOVER STRAFFORD COUNTY
State and Zip Code	N.H. 03820
Telephone Number	6038714144
E-mail Address (if known)	

## Defendant No. 3

Name	BRANDY WARREN
Job or Title (if known)	UNKNOWN SEALED*
Street Address	*UNK
City and County	*UNK
State and Zip Code	*UNK
Telephone Number	603-4222131
E-mail Address (if known)	*UNK

## Defendant No. 4

Name	JESSICA COLLINS
Job or Title (if known)	PROPERTY MANAGER WAMESIT
Street Address	HOLIDAY DRIVE
City and County	PORTSMOUTH ---ROCKINGHAM COUNTY
State and Zip Code	NH 03801
Telephone Number	UNK
E-mail Address (if known)	UNK

## Defendant No. 5

Name NANCY BLAISE  
 Job or Title (if known) GAL  
 Street Address HIGH MEDEOWS FARM LANE  
 City and County ELIOT  
 State and Zip Code MAINE 03903  
 Telephone Number unk  
 E-mail Address (if known) blaise@comcast.net

## Defendant No. 6

Name JOHN PEDLETON  
 Job or Title (if known) JUDGE  
 Street Address PERROT AVE, PORTSMOUTH DISTRICT COURTHOUSE  
 City and County PORTSMOUTH---ROCKINGHAM COUNTY  
 State and Zip Code N.H. 03801  
 Telephone Number UNK  
 E-mail Address (if known) UNK

## Defendant No. 7

Name PORTSMOUTH HOUSING  
 Job or Title (if known)  
 Street Address  
 City and County PORTSMOUTH---ROCKINGHAM COUNTY  
 State and Zip Code N.H. 03801  
 Telephone Number UNK  
 E-mail Address (if known) UNK

## Defendant No. 4

Name Laura L.  
 Job or Title (if known) DCYF Employee  
 Street Address  
 City and County Portsmouth (Pease) Rockingham  
 State and Zip Code N.H. 03801  
 Telephone Number 1 603-433-8300  
 E-mail Address (if known) UNK

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

B. What date and approximate time did the events giving rise to your claim(s) occur?

**Statement of Claims:**

Supported by underlying facts with a more in depth look at the all facts being provided via petitioners website located on campaign partner and easily reached via (inevergaveup.org). This was done previously on behalf my youngest daughter Amilianna and Nikala because of the extreme complexity of challenges ascertaining the true facts surrounding their real lives for the authorities, courts and public to know the truth as i can provide accurate and fair judgements thereof

Most claims maturing and occurring in Portsmouth District Court in the family division and presided over in its entirety by Judge John Pendleton. All approximate times of most of these events should've been provided in the case summary of the matter of Daryl Singleterry and Brandy Warren # 670-2018-DM-00307 - incomplete case summary is one of the points of contention and will be addressed in the forthcoming claims seeking relief of injunction.

[D1] **Claim #1:** In the hearing, attorney Shaheen has a long history of being a racist He has continued and exhibited this frowned upon behavior in the matter of Daryl Singleterry and Brandy Warren. This time for his niece, Brandy Warren. **This continuation of this prior pattern of racial behavior violates my 14th amendment right. Throughout every stage, petitioner has been and is presently being violated because Judge Pendleton has made and promised to make judgments against the petitioner on knowingly false or incomplete information. Further the false evidence, omissions, evidence being presented by the respondent's attorney are viewed as the truth and all the judgements being made without proper thorough investigations. And never with consideration of contrary evidence from the petitioner. Always decided in respondents' favor.** The judge and the GAL, never once treated petitioner equally under the law, particularly in comparison to the respondent. The court and the GAL have favored the respondent, leading biased treatment and unjust rulings.

**Claim #2:** Attorney Driscoll can be heard clearly stating that attorney Shaheen was racial stereotyping. But it was to no avail, because I refused to object in the one hearing she appeared, when several times, I advised I wanted her to do so. Before her appearance in the one hearing and during. Judge Pendleton refused to notice or acknowledge blatant stereotyping of me as a black man. Even when pointed out by my attorney Amy Driscoll. **Driscoll violated petitioner's 6th amendment right to enjoy effective assistance of counsel. She purposely refused to object at all important stages during her one hearing attended, and brief representation of petitioner. Attorney Shaheen while working for Shaheen & Gordon committed gross violations of the petitioner's 1st amendment right to not be subject discriminatory speech, most vividly during hearing in audio CR3\_20190905-1043).**

**Claim #3:** Attorney Driscoll, refused to object anything on the behalf of the petitioner when expressly asked to do so, by client Daryl Singleterry. She became visibly scared during hearing in audio **CR3\_20190905-1043**), refusing even to file objections relating to her own words. Opting -instead to file for withdrawal. Told me to give up, and follow attorney Shaheen's and respondents wishes and maybe i'd get to spend time with Amilianna. **Then she quit and asked for the remainder of her fee. Attorney Amy Driscoll violated petitioner's 6th amendment right to enjoy effective assistance of counsel.**

**Claim #4:** Attorney Shaheen was again allowed to push his usual daily racist rhetoric, but this time in court. Presenting as evidence# **670-2018-DM-00307** photo of petitioners hard working family members, including innocent minors and in a racially motivated prop (Disney). This was a veiled threat to show his power plus influence over this court. Showing he could do this same scenario to each of them. This was a premeditated attack and racially motivated way to discredit petitioner's lawful lifestyle, and lawfully earned finances, Weirdly, choosing to use a basic trip to disney world as a way to engage in character assassinations against petitioner and family, high level stereotype perpetuation. Establishing his right to flaunt his discriminatory ways in this



court under his good friend Judge Pendleton. Not a word of objection from attorney Driscoll on my behalf, who sat there ignoring the petitioner's wishes to again do so. The biggest reason respondent provided and attorney Shaheen produced this photo as evidence was, to establish that they believe all blacks look alike, even though the petitioner is not present in that photo it's close enough. Obviously not a warning by Pendleton or objection by Driscoll. Attorney Shaheen's continuation of his lifestyle pattern in case of racism in case # **670-2018-DM-00307** violated my 14th amendment right. Throughout every stage, petitioner has been and is presently being racially targeted because Judge Pendleton has made and promised to make judgments against the petitioner on knowingly false or incomplete information. Further, knowing false evidence, omissions, evidence being presented by the respondent's attorney are purposely being viewed as the truth. With all the judgments being made without proper thorough investigations. And never with consideration of contrary evidence from the petitioner. Always decided in respondents' favor. The judge and the GAL, never once treated petitioner equally under the law, particularly in comparison to the respondent. The court and the GAL have favored the respondent, leading to biased treatment and unjust rulings. **The 14th amendment provides the fundamental right to not be racially profiled and discriminated against, particularly regarding representation in court proceedings.**

**Claim #5:** Judge Pendleton firmly has established that # **670-2018-DM-00307** has been and will continue to create a safe haven for obstruction of justice, colluding with Attorney Shaheen, Driscoll, GAL Blaise, the law firm of Shaheen & Gordon and yet to be mentioned co-conspirators. They have blatantly unified to break the law at will and limit the petitioner's ability to present evidence from day one, never to mention and only full suppression of anything that may be contrary. Absolutely no cross-examination of respondent's Warren's version of facts. Further, it has been abundantly clear throughout the constant racial stereotyping, misogynistic tones by Shaheen towards even minor females, that each member of this group would act in concert and inflict harder retaliation on the petitioner. As stated as a clear warning by Judge Pendleton during hearing in audio **CR3\_20190905-1043**) against petitioner. Again attorney Driscoll should have objected, that was her part in the group's collaboration. The above mentioned colluded against petitioner from the start and continue to this day. Their combined actions violated 1st amendment, judge allowing discriminatory speech about petitioner- **19th amendment allowing misogyny of my daughters- the 15th amendment racial profiling and 5th amendment infringed my right not to be deprived of life, liberty, and property without proper due process of the law.**

**Claim #6:** The entire proceedings of case # **670-2018-DM-00307** Petitioner Daryl Singleterry and Respondent Brandy Warren. The petitioner has filed several motions stating objections with attachments exposing respondent's version of the facts and attorney Shaheen's bold lies on her behalf.. Also a lengthy motion stating GAL's Blaise refusal also to present any of the evidence provided to her by me, once she was assigned by the court in this case. The case summary depicts no motions of relevance relating to the facts of the case on my behalf. Case summary doesn't even have my initial, first motion stating the respondent violent altercation of abuse, How was the respondent granted the right to respond and flagrantly state the same incident-only she stated it was me, who choked his daughter, Amilianna. Without investigation her entire response was determined by Pendleton as truth. This has been Judge Pendleton's bias pattern from day one, faithfully beholden to attorney Shaheen's whims. And this hearing was a perfect display. See evidence flash drive exhibit audio named (**copy of copy Portsmouth CC CR3\_20190905-1043**) for these purposes. All these tactics by all the members mentioned above, as well as those to be named purposely colluded in organized racist manner, to use their positions of influence to intimidate, harass and dissuade my pursuit and my will to reunite with Amilianna Singleterry. Pendleton, purposely ignored the supposed crux of his responsibilities in this case. First, secure the safety of Amilianna and seek to ascertain all the facts from both parties to gain the truth. This was stated by petitioner in his original petition to launch this case against the respondent in an attachment. This has never been referred to or appears on the case summary-see exhibit # ( ). Petitioner asked that Brandy Warren action be known to **dcyf**. Further, it should have been a top priority when the abuse of Amilianna was alleged by both parties. His unbiased duty. Violation of —.

- a. Due Process (5<sup>th</sup> and 14<sup>th</sup> amendment)
- b. Equal Protection (14<sup>th</sup> amendment)
- c. Freedom from Discrimination (14<sup>th</sup> amendment)
- d. Parental Rights (9<sup>th</sup> amendment)

**Claim # 7: Judge Pendleton has created a safe haven for racism and racist to like Attorney Shaheen to thrive with swift retaliation against the petitioner and anyone who chooses to aid my petition. Using the court, attorneys, rockingham sheriff officers, a GAL and letting respondent aka mother in another family case Daryl singleterry and Mary Reed use an illegally obtained and executed capias to her advantage on a personal level and use unsubstantiated facts via an ex parte hearing to gain a protective order. Again, because this was levied again me and someone was assisting me, Judge Pendleton bias per usually granted this order against Amber Finley just to retaliate against me and pressure me on behalf of attorney Shaheen & Gordon and its founder William Shaheen. If statements were investigated by the court in any manner- it would be found that Mary Reed was falsifying her facts to satisfy a personal problem. Nikala Singleterry and Amilianna Singleterry are biological sisters, and she prior knowledge of material details deriving from the case between petitioner and respondent in case # #670-2018-DM-00307 well and its previous biased decisions against petitioner toward respondent. This prior knowledge gave her her belief that racism, and the use of false facts because of her race, would have her easily prevail. and she was correct. False facts, omission of any form of truth was engineered by Mary Reed and security officer Conners of Mary Reed's housing complex. Using racism to get what you want is becoming a copycat method against black men in Portsmouth family court. Only your color of skin will prevail you for Judge Pendleton uses Jim Crow laws as his authority to trump one's civil liberties. Petitioner was arrested when Mary Reed called Portsmouth police department- saying she'd been hit by Amber Findley, wwe were stealing her child Nikala, and Amber was with Daryl Singleterry who is wanted, and assaulted her at her home. Portsmouth tracked Petitioner and Amber Findley on route one heading to the circle or north bound. Pulled the petitioner out the passenger side and searched him and put him in handcuffs. No explanation of probable cause for stopping Amber Finley, just said I had a warrant in the end on a capias warrant. the petitioner was held in jail for 3 days. He was told by the JUDGE pendleton that the petitioner needed a monetary amount, whatever I have- just pay something and you will be released. 3 witnesses of the hearing heard these same words and similarly thought my \$40 wasn't a show of good faith so me with these rockingham officers decided to contact Amber, who was waiting all day for instructions, to pay \$300. a reasonable amount in all the officers eyes. And a satisfying amount rather than \$40. Amber takes the day off, goes to Portsmouth district court, and was told it was \$1000 cash on my second day of incarceration. There was another subsequent hearing on my release presided by Pendleton and he berated the petitioner. And proceeded to lie about what all three rockingham officers heard as well as the petitioner. And again threatened me once again with further loss of liberty or freedom from rockingham jail. Because Amber Findley chose to try to bail me out on the original terms stated and relayed to rockingham county- he remembered her name and retaliated against her- on behalf of Mary Reed granting A PROTECTIVE ORDER between Nikala and Amber Findley with no grounds. And to here for helping someone who is black instead of her own race. The these incidents involves a multitude of potential civil rights violations against the petitioner**

1. Violation of the petitioner's right to due process under 6th amendment: The petitioner was arrested without probable cause, held in jail without a clear explanation or opportunity to post bail, and subjected to biased treatment by Judge Pendleton during court proceedings.
2. Violation of the petitioner's right to equal protection under the law 14th amendment and 5th amendments Judge Pendleton treated the petitioner differently based on



their race, and this constituted a clear violation of of petitioners and Amber Findley's right to equal protection under the law.

3. Violation of the petitioner's right to freedom from racial discrimination again the 14th amendment violation: Blatant racism played a role in the actions taken against the petitioner, such as the use of false facts or bias in court proceedings, this would constitute a violation of their right to freedom from racial discrimination.
4. Violation of the petitioner's right to freedom from retaliation is a violation of my first amendment civil rights: Judge Pendleton retaliated against the petitioner because of events related to # 670-2018-DM-00307. to make a point.

**Claim # 8 plus some underlying facts**

1. Petitioner has reached out to [Portsmouth post office and they never established from anyone that petitioner's address was 188 madison street Portsmouth, nh. They unequivocally never would break that law they said.
2. The rockingham sheriff never served the petitioner ever, and knowing that he really had not - proceeded to try to force the petitioner at rockingham jail to sign a waiver. which i refused. he then replied, " that then i might not go to court anytime soon. I said, "So, you never served me as the law orders you to have to do, nor was there any type of post of an order left at that address. You faked serving me and trying to cover yourself by trying to force me to sign a waiver.
3. Judge Pendleton says he doesn't care if I wasn't properly served, that's gonna be the petitioner's address. And that he was forcing my mother to be responsible for the petitioner's family court mail, against her wishes. If there was non compliance, petitioner could again find himself in jail on another capias warrant. petitioner took this as the courts veiled threat against petitioner and his mother.
4. \_\_\_\_\_

**claim #9 underlining facts and actions by the Rockingham sheriff officer**

***Illegal Actions of the yet to be determined and named Rockingham Sheriff's Officer violated petitioners Fourth, Fifth, Sixth, and Fourteenth Amendments of the United States Constitution..***

***1. This un named rockingham sheriff falsely claimed to have served the individual as a pretext to arrest petitioner/plaintiff, this constituted an unreasonable seizure in violation of the Fourth Amendment.***

***[D2] Fifth Amendment: The Fifth Amendment protects individuals from being deprived of life, liberty, or property without due process of law. Falsely claiming to have served someone in order to arrest them deprived the petitioner/ plaintiff of his liberty without proper due process, thus violating petitioners Fifth Amendment rights.***

***Fourteenth Amendment: The Fourteenth Amendment guarantees equal protection under the law and prohibits states from depriving any person of life, liberty, or property without due process of law. This Rockingham Sheriff's Officer engaged in discriminatory practices and knowingly targeted the petitioner based on my race or other protected characteristic, this constituted a violation of their Fourteenth Amendment rights. Sixth Amendment:***

***The Sixth Amendment guarantees the right to a fair and speedy trial, including the right to be informed of the nature and cause of the accusation. Falsely claiming to***

**have served someone in order to arrest interfered with their ability to prepare a defense and undermine their right to a fair hearing.**

**(Irreparable Injuries)**

1. **[D3]I kept requesting attorney Driscoll to object throughout the hearing, to which she did not respond or listen to my objections so that they would be on record for future appeal options. After asking her to object to the hearing post out, she decided not to continue representing me further. Attorney Driscoll never afforded me the reasonable opportunity to consider the risks and alternatives and options to raise questions and concerns. She was supposed to impress upon me the seriousness of her still going forward ( strategy) against my lack of permission and express consent to continue forward in this construct. How it may cost me and if I wanted her to keep moving forward. It was her duty to honor my wishes as my attorney. She was hell bent on avoiding the disputes and ambiguities of the racist rhetoric toward me and my family members spouted by Attorney Shaheen. Simply because they are all close friends and are a network that will not go against each other. Attorney Driscoll continued her obstinate toward me until she finally demanded payment for her services, and still quit my case. Leaving me, as during the hearing, with the same legal concerns as previously. Still wanting to express those legal concerns in writing or verbally through objections to Judge Pendleton's court. She is in violation of my constitutional right to effective assistance of counsel, and to be free from abusive discrimination that was allowed by all parties in that courtroom. Out of all the defendant's Attorney Driscoll's liability can be shadowed by the petitioner and this court. She with her own words, determined that I was being black stereotyped by attorney Shaheen. Her next steps should have included objections to this tone going forward, and made judge Pendleton acknowledge that fact on record for possible appeal , rehearing, recusal or reset the entire case # 670-2018-DM-00307 and (copy of copy Portsmouth CC CR3\_20190905-1043) . Attorney Driscoll and her law firm Driscoll Offices were in Breach of contract and for these above facts previously stated—petitioner seeks a lien against the firm's assets as a remedy for the breach.**
2. **Shaheen & Gordon law offices should be easily pre determined by the court as qualified to be held to a preliminary judgment in the form of a lien because Attorney William Shaheen's Myriad of violations of my civil rights -blatantly via on audio case # 670-2018-DM-00307 and (copy of copy Portsmouth CC CR3\_20190905-1043) .The ask that that a temporary lien be established against the law firm's assets to satisfy petitioners dire needs-given the continues, breaches and attacks on petitioners and his young children's civil rights. They have shown their intentions. And clearly have no intentions of stopping their racist tones. Nor do they bat an eye about allying with others to break the law to get the outcomes they wish. The collective in each next hearing in relation to both above cases become more aggressive in tone, physically.The threats come from so many people and ways. Petitioner is honestly expecting something lethal. My children have been physically, verbally abused. My mother has been harassed and threatened directly, by Case worker i believe Laura from dcyf because she chooses not to let the court use her address as a home address for the petitioner. Laura told me to call her in texas and have my mom make me a key to her mailbox and send it. Because that's the address the court has assigned for the petitioner. If I don't get the mail, I will be going back to jail.. Petitioner is not on the lease, as explained by the property manager and to his face, verbatim to the**

sheriff. Daryl singleterry doesn't live at this address. During the times supposedly that the sheriff came to 188 Madison st. apt # 24, The petitioner's mother was in texas. And had been for months. The sheriff never legally affected any service of process to the petitioner. These are mentioned above .

3. When an entity or individual receives a federal loan, they are typically subject to a range of legal obligations and restrictions. These include civil rights and criminal activities. In this case the matter of PPP loans obtained by the law firm Shaheen & Gordon, the overwhelming evidence presented by petitioner/plaintiff, outlining all the civil rights violations and criminal conduct involving William Shaheen's and his family members. Petitioner/plaintiff believes the evidence proves misuse of funds. Federal loans come with specific intended uses and misappropriating funds constitutes fraud by Shaheen & Gordon. Petitioner/ Plaintiff believes he has demonstrated that these funds were misused, because Shaheen & Gordon conspired with family members of the Shaheens to commit fraud against this petitioner/ plaintiff. and used the founder Willaim Shaheen to execute the fraud for his niece Brandy Warren/ respondent. See evidence flash drive exhibit audio named **(copy of copy Portsmouth CC CR3\_20190905-1043)** for these purposes. Attorney Shaheen proceeded to violate petitioners/ plaintiff's civil rights. Hence the law firm used these funds in a manner that violated civil rights laws or other regulations related to discrimination. The recording provided to this court earlier demonstrated beyond a doubt that Williamshaheen was Black Man Stereotyping the petitioner/ plaintiff. So flagrantly, attorney Amy Driscoll, pointed out this fact on the recording.
- 4.

**Relief:**

**I am requesting the following:**

1. **Require a new family court judge to replace Judge Pendleton to preside over the case to ensure impartiality and fairness in the case between Daryl Singleterry and Brandy Warren; case # 670-2018-DM-00307 and Daryl Singleterry and Mary Reed case # 670-2018-DM-262**
2. **Prohibiting Shaheen & Gordon from engaging in further obstruction tactics or discriminatory behavior, further racial discrimination towards petitioners. Prohibit further motions for veiled death threats via mandatory life insurance policy acquisition by petitioner , also ordering the recipient to be Brandy Warren- not even Amilianna as recipient.**
3. **[D4]Mandating a review of all previous rulings and decisions by Judge Pendleton to determine if they were influenced by racism, bias or aiding and abetting the cover up criminal misconduct.**
4. **Ordering sanctions or disciplinary actions against the judge and lawyers involved in these violations as the courts sees fit.**
5. **Ensuring that Daryl Singelterry is provided with a fair and equitable opportunity to present his case going forward And seek justice from the discrimination he faced thus far**
6. **Request the court to appoint DCYF case worker Haley Malloy to head and investigate case # 670-2018-DM-00307 and case # 670-2018-DM-262 providing the court with full and detailed reports on the true merits of both cases presided over by Judge John Pendleton. At the same time have Haley Malloy closely communicate any criminal activity discovered to the F.B.I and the New Hampshire state attorney's office so that no stone is left unturned. While this process ids taking place, rescind all previous orders by in the above mentioned two cases by Judge Pendleton and forward the circumstances and information in its entirety to the New Hampshire Judicial Conduct Committee to investigate Judge Pendleton's prior conduct in relation to these above stated cases**
7. **Request that the FBI be appointed to investigate evidence of federal law and civil rights violations and misconduct by Judge Pendleton. Investigate the evidence put forth by petitioner (reference Inevergaveup.org)**

8. Request that the NH Attorney General's civil rights unit investigate my complaints of racial discrimination. (reference Inevergaveup.org)
9. Because of irrefutable damage, I would like for the company "Pacific World Market" to quantify how much my product was worth based off of how much snapbacks are currently worth each year. This company wanted to get a licensing deal for me back in 2018.
10. Ask that a preliminary injunction be awarded to the petitioner against Attorney Amy Driscoll of Driscoll law offices because she withdrew and never objected to anything and demanded she get paid anyway. The firm breached its contract with the petitioner and failed to fulfill its obligations under the retain# 670-2018-DM-00307

Petitioner seeks a lien against the firm's assets to remedy the above said breach and prevent selling or exchange of assets, while this court decides its judgements. Or given the obviousness of attorney Driscoll's violations, petitioner asks this court to order that the firm be obligated to pay the necessary fees to acquire petitioner a new attorney of his choosing. This attorney would take over for petitioners choppy pro se status and proceed henceforth in a manner more accustomed by this court- but on behalf of petitioner. Also petitioner ask for a preliminary judgment of \$150,000 in damages to be paid by Driscoll law firm immediately -for when petitioner was being represented by Amy Driscoll he had a business, condo , transportation, raising a family within a positive overall environment etc. The Driscoll law firm's lack of professionalism contributed to his losing Amilianna even further, loss of his business ventures and positive family environment that was created by father and role model petitioner. This amount seems to be adequate in the petitioner's eyes and would not seek further damages against this firm for its brief but integral part in this travesty.

11. Petitioner ask that all judgements leading to the loss of his New Hampshire driver's license be rescinded and be given his privileges back immediately.
12. [D5]Petitioner is the holder of several U.S. Patents. and has over the course of the lifetime of case # 670-2018-DM-00307, not able to continue to accomplish his goal of providing and realizing the generational wealth that will be created in various ways. All the previous defendants mentioned and the law firms have contributed in a myriad of ways to defame the petitioner in his personal life and business going forward as it related to petitioners' U.S. patents. Pacific World Marketing LLC has for the lifetime of this case reached out to petitioner to license all his patents to realize this generational wealth. Yet petitioner has been hesitant because of the above mentioned conspirators non stop defamation of petitioners character and racism, weaponized by Judge Pendleton. Example of generational wealth lost just to give the court an idea to the court. Petitioner submits that in 2023 his U.S. patent area related to snap back baseball caps, annual revenue was approximately 17.6 billion global dollars a year . If the petitioner only received 1 percent that revenue from his licensed , royalty deal could bring him a generational yearly amount of \$176 million annually. That's only speaking at the hypothetical low end garnered. This is a generational change to the snap back hat, one that no one ever in creation has thought of but me and the originator in around the year 1900. Petitioner would like Pacific World Marketing LLC to be appointed by the court to assess the likelihood that petitioner was to receive licensed deals on all 5 of his U.S. Patents and what loss in time accumulates to dollars. This will give the court more substantial figures in dollars, thereby giving the court an idea what to award in damages done by all the defendants. Once petitioner is hopefully awarded his preliminary ask, he will promptly ask his new attorney to apply the necessary liens to all defendants who are liable in this case, and proceed as necessary going forward on my behalf.



13. [D6]Petitioner as for a preliminary judgment against Shaheen & Gordon law offices, a preliminary judgment in the form of a lien because Attorney Shaheens Myriad of violations of my civil rights -blatantly via audio **case # 670-2018-DM-00307 and (copy of copy Portsmouth CC CR3\_20190905-1043)** Petitioner ask that a temporary lien be established against the law firm's assets. Petitioner has audio racism and a hard copy photo presented by him displaying his racism. Given the continuous breaches and attacks on petitioners and his young children's civil rights. And now his 73 mothers are being threatened and harrassed. The conspirators throughout this case have shown their intention of stopping racist tones. Or allying with others to break the law and further. The threats of violence have been issued to anyone who helps me. . The petitioner will seek the most damages from Shaheen & Gordon law firm- based on attorney Shaheen's numerous violations against petitioner. When the investigation is said and done. The court will find out, that Brandy Warren, Kim Warren, an unknown Shaheen conspirator, came to Shaheen & Gordon with a plan of organized racism and Bill Shaheen (the fixer) agreed to execute this plan to make up a fake story on petitioner and ruin his and his daughters lives for their families financials benefits. And put to bed the original MOTIVE- TO END AN OVER DECADE LONG FAMILY FINANCIAL DISPUTE.. PETITIONER SEEKS A PRELIMINARY LIEN SHAHEEN AND GORDONS ASSETS JUST UNTIL PACIFIC WORLD MARKETING FINISHES PROVIDED THIS COURT POTENTIAL DOLLAR AMOUNTS. .
14. SO IN THE ALTERNATIVE, PETITIONER/ PLAINTIFF SEES NO MATERIAL DISPUTE IN THE FACTS SURROUNDING WILLIAM SHAHEEN'S RACISM AGAINST PLAINTIFFS FAMILY, VIA THE PHOTO HE PROVIDED AS EVIDENCE AGAINST PETITIONER. DURING THE HEARING THIS CLEAR RACISM, MISOGYNISTIC BEHAVIOR WHEN DESCRIBING MY DAUGHTERS' ABILITIES TO SPEAK FOR THEMSELVES. HIS BEHAVIOR DEMONSTRATED HE AND SHAHEEN & GORDONS LAW FIRMS RACIST METHODS CLEARLY IMPACTED THE COURT PROCEEDING. HIS DEFAMATION TACTICS HUMILIATED MY PETITIONERS REPUTATION ON SEVERAL LAYERS AND NECESSARILY INVOLVED MINORS WITHOUT EXPRESS CONSENT FROM THEIR PARENTS TO USE THEIR LIKENESSES AND ALSO AS A THREAT OF POSSIBLE FORTHCOMING NEGATIVE CONSEQUENCES AGAINST PETITIONER/ PLAINTIFF AND HIS FRIENDS CHILDREN AND PETITIONERS OWN FAMILY. THIS TAINTED USE OF PPP FUNDS DURING FAMILY COURT PROCEEDING, AND SPOILED THE LEGAL PROCESS.
15. [D7]PETITIONER/ PLAINTIFF ASK FOR SUMMARY JUDGMENT OF 3 MILLION DOLLARS , 6 MILLION DOLLARS FOR NIKALA SINGLETERRY, AND 9 MILLION DOLLARS TO AMILIANNA SINGLETERRY IN COMPENSATORY IN DAMAGES. THESE AMOUNTS WILL REPRESENT THE YEARS AMILLIANNA AND NIKALA SINGLETERRY HAVE BEEN SEPARATED. BLOOD SISTERS, ONLY TO HAVE MILI SNATCHED AWAY, AND USED AS BONDANGE, SOLD IN A SLAVERY DEAL, BY HER OWN MOTHER AND GRANDMOTHER. SHAHEEN & GORDON LAW FIRM BY JIM CROW DESIGN, DISGUISED AS CHILD SUPPORT. TO BE PAID BY PLAINTIFF, WHOM HAD NO IDEA THIS RECONCILIATION, OR THIS SECRET BRIBERY PAYOFF THAT HELPED MEND THEIR FAMILY DIFFERENCES. IN TRUE FORM THE RACIST BILL SHAHEEN EXECUTED THE FRAUD IN PERSON. FEDERAL LAW PROHIBITS, ENGAGING IN BRIBERY OR CORRUPT PRACTICES FUNDED BY PPP LOANS. IT IS ILLEGAL UNDER FEDERAL LAW. THEREFORE, THE PLAINTIFF ASK FOR A SUMMARY JUDGMENT OF THE TOTAL OF 18 MILLION. WITH 95% NIKALA AND AMILIANNA'S AWARDS BEING PUT IN TRUST. AND SUBSEQUENTLY ALL FORTHCOMING PUNITIVE DAMAGES IN TO BE DETERMINED WHEN AND HOW THE COURT WISHES.
16. LAST THE PETITIONER, PLAINTIFF, ASK THIS COURT TO SUPERCEDE ALL PREVIOUS ORDERS BY JUDGE JOHN PENDLETON INVOLVING BOTH FAMILY COURT CASES PREVIOUSLY AND GRANT PLAINTIFF FULL CUSTODY OF AMILIANNA SINGLETERRY AND NIKALA SINGLETERRY. ALL ORDERS BY JUDGE PENDLETON, INCLUDING ALL PROTECTIVE ORDERS AGAINST AMBER FINDLEY BE RENDERED NULL AND VOIDED. AND NIKALA SINGLETERRY REMOVED IMMEDIATELY FROM THE CARE OF MARY REED. JUDGE PENDLETON'S PRIMARY GOAL WAS TO KEEP NIKALA SINGLETERRY'S LIFE OUT OF JEOPARDY AND DANGER. AND GET HER INTO THE SAFETY OF AMBER FINDLEY AND DARYL SINGLETERRY. FURTHER, ANY TRESPASSING ORDERS RECEIVED BY JESSICA CONNERS, THE PROPERTY MANAGER WHO, SUBSEQUENTLY, HAD THE PORTSMOUTH POLICE HUNT PLAINTIFF DOWN IN HIS CAR, LATE AT NIGHT AND SERVED TO THE PLAINTIFF . JESSICA CONNERS AND MARY REED ARE CLOSE FRIENDS WHO WORKED HARD TO FASHION MARY'S SCHEME TO GET PETITIONER BARRED FROM THE



HOUSING PROPERTIES. AND DO SO INITIALLY WITHOUT MY KNOWLEDGE. BEFORE THE TRESPASSING NOTIFICATION FINALLY WAS SERVED TO ME. FEDERAL LAWS ARE DESIGNED TO CONTOUR ABUSE OF POWER BY PEOPLE LIKE JESSICA CONNERS PREVENTING RACIAL DISCRIMINATION IN HOUSING. AND ALSO ORDER AN INVESTIGATION OF JESSICA CONNERS FOR CIVIL RIGHT VIOLATIONS.

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[D1]<https://www.presidency.ucsb.edu/documents/hillary-clinton-campaign-press-release-statement-from-bill-shaheen>

[D2] AFTER SPENDING A NIGHT IN THE ROCKINGHAM COUNTY JAIL ON A ILLEGALLY OBTAINED AND SIGNED WARRANT FOR ARREST BY JUDGE PENDELTON, PLAINTIFF/ PETITIONER, WAS THREATENED BY A ROCKINGHAM SHERIFF SAYING I HAD TO SIGN SOME PAPERS FOR HIM AND LET HIM BOOK ME AGAIN OR I WOULD NOT BE RELEASED. I REFUSED A SECOND ILLEGAL BOOKING. PETITIONER BELIEVES THE SHERIFF WAS TRYING TO GET PLAINTIFF/ PETITIONER TO SIGN A WAIVER OR SOME TYPE OF CONSENT FORM HOPING TO COVER-UP HIS ILLEGAL CIVIL RIGHTS VIOLATION. PETITIONER/ PLAINTIFF HAS NEVER BEEN LEGALLY SERVED AT ANY ADDRESS. KNOWING THIS FACT, THE DCYF CASE WORKER, THE ROCKINGHAM SHERIFF OFFICER AND JUDGE JOHN PENDLETON AGREED TO FRAUDULANTLY FAKE THE SERVICE, SO THAT THE CASE COULD MOVE FORWARD. THEN ILLEGALLY ORDERED A CAPIAS WARRANT, SUBSEQUENTLY, THE PETITIONER/ PLAINTIFF WAS ARRESTED. RUN DOWN IN PURSUIT BY A PORTSMOUTH POLICE OFFICER, WHOM PULLED ME OUT OF THE CAR, ASKED MY NAME AND ARRESTED ME. PETITIONER STAYED IN JAIL ON A ILLEGAL CIVIL MATTER FOR 3 DAYS IN DRY CELL BECAUSE I REFUSED ONLY FOR MEDICAL REASONS TO TAKE A RADIATION SCAN.

[D3] 1. <https://www.nhbr.com/john-pendleton-a-judge-with-a-personal-touch/>

2. Amy Driscoll could not professionally separate her personal relationships, and fulfill her obligations under her retainer agreement to petitioner in

3. Attorney William Shaheen is founder of Shaheen & Gordon and,

4. Respondent Brandy Warren is the niece of attorney Shaheen and has a previous history of receiving favoritism from allies and from her uncle in other cases involving her--see [inevergaveup.org](http://inevergaveup.org) for in depth view of Shaheen and Brandy Warren his niece

5. #670-2018-DM-00307 and (copy of copy Portsmouth CC CR3\_20190905-1043)

[D4] Petitioner notes that these acts by Pendleton, William Shaheen, Amy Driscoll, Nancy Blaise--added clerks in the Portsmouth district court, Laura from N.H child Support--have been engaging in criminal activity on behalf of the Senator's niece and respondent in this case. Brandy Warren in order to wield the case # 670-2018-DM-00307 in Shaheen & Gordons.

Petitioner submits that those named above have participated in a racketeering conspiracy and violated several New Hampshire state civil rights violations as well as Federal constitutional law infractions. The main motive has been to cover up and suppress past criminal activity's between the Warrens and Shaheen's. The only way the petitioner has been able previously to shine light on these transgressions is to provide the world this information at see [inevergaveup.org](http://inevergaveup.org). This is also a cite explaining how these family's, law firms etc. have destroyed the lives of my two young daughters (Nikala and Amilianna Singleterry's)--with racism, perfecting Jim Crow procedures to a tee. Amilanna Singleterry has been bartered by her mother and the Shaheen family to settle an old family dispute between Warrens and Shaheen family members.

[D5] Pacific World Marketing LLC has reached out to petitioner numerous times. And petitioner was working on a possible deal for them to license all my U.S. Patents globally --SEE recent letters from their company even sending letters to my mothers address in search of possible interest by petitioner

[D6] PETITIONER SUBMITS IF ORDERED BY THIS COURT TO INVESTIGATE ALL THOSE PREVIOUSLY MENTIONED WILL BE SUBJECT EASILY TO FEDERAL RACKETEERING INDICTMENTS. AND THE ATTORNEY GENERAL'S OFFICE WILL UNCOVER OVER A DECADE WORTH OF CRIMINAL ACTIVITY THAT THE DEFENDANTS ARE TRYING TO COVER UP AND SUPPRESS. IT'S NOT GOING TO BE DIFFICULT. THEREFORE PETITIONER BELIEVES A LIEN AGAINST THE LAW FIRMS ASSETS IS A MUST. AGAIN PLEASE GLEN [inevergaveup.org](http://inevergaveup.org)

• [D7] THIS FEDERAL COURT HAS FEDERAL JURISDICTION TO GRANT ALL PLAINTIFFS RELIEF. Request the court to appoint DCYF case worker Haley Malloy to head and investigate case # 670-2018-DM-00307 and case # 670-2018-DM-262. AS NOTED EARLIER PPP LOANS GIVES THE FEDERAL COURT JURISDICTION AND 670-2018-DM-262 OCCURRED IN A HOUSING UNIT CALLED WAMESIT- UNDER THE PORTSMOUTH HOUSING AUTHORITY, THIS PROPERTY IS FEDERALLY FUNDED (HUD), ADDED THIS IS A MATTER OF JUDGE JOHN PENDLETON PURPOSELY LYING SAYING THERE Was no report from dcyf-knowing there was. He knew he had to give Daryl Singleterry full custody of Nikala Singleterry and remove her to safety from a drug infested, unsafe situation for a 14 year old. like he instantaneously ordered protective orders on 6the words of Mary reed in the hearing before, he could now order an order to remove my daughter to an safe environment in accordance to the report by case manager Haley Malloy findings. Mary Reed has consistently been found to be a liar and a prolific drug user. Because Nikala is a black child, Pendleton would not break his white supremacy code of honor. Honor displayed all through both family court cases.

Thank you for considering this motion for a federal injunction. I respectfully request that the court grants the injunction to prevent further harm and ensure fair proceedings. Given the urgency of the matter, I kindly ask for expedited consideration.

Thank you for your time and patience in these multi-layered and multi complex matters.

Respectfully submitted,



DARYL SINGLETERRY 6/28/2024  
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